



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

MURIEL GOODE-TRUFANT
Corporation Counsel

SANDRA A. BOBER
Senior Counsel
Tel.: (212) 356-0827
sabober@law.nyc.gov

May 27, 2025

BY ECF

Honorable Peggy Kuo
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Takisha Reid v. City of New York, et. al.*, 20-cv-3926 (PK)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, representing Defendant the City of New York in the above-referenced action. I write jointly with counsel for Plaintiff Takisha Reid and counsel for Defendant Gregory Howard (collectively, with counsel for the City (“Counsel”). As the Court is aware, on May 19, 2025, Counsel appeared telephonically before Your Honor in connection with the City’s request for a ruling regarding attorney-client privilege. Specifically, the City requested a ruling that Plaintiff waived privilege regarding the issue of attorney authority raised in her Rule 60(b) motion and sought permission to communicate with her former counsel, Vic Pawar, as to that issue. Your Honor denied the City’s request and, as an alternative, directed Mr. Pawar to file the following, under seal, no later than today, May 27, 2025:

- 1) an affidavit detailing any communication he had with Plaintiff related to the voluntary dismissal of the negligent screening, training, hiring, and retention claim against the City; and
- 2) any documents related to such communication.

Docket Entry dated May 19, 2025.

Mr. Pawar filed a response to Your Honor's order on May 23, 2025. *See* Docket Entry dated May 23, 2025. Counsel is unable to view the document Mr. Pawar filed on ECF.¹ Plaintiff's counsel and I reached out to chambers this morning and were advised to obtain a courtesy copy from Mr. Pawar or request permission from the Court to obtain the document. Thereafter, in response to a request for a courtesy copy of the filing, Mr. Pawar advised that he would not provide a copy of his under-seal filing without the Court's permission. Accordingly, Counsel jointly and respectfully request an order directing Mr. Pawar to provide Counsel with a courtesy copy of the document(s) he filed under seal on May 23, 2025.

I thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Sandra A. Bober
Sandra A. Bober
Senior Counsel

cc: All counsel of record (via ECF)

¹ Additionally, the June 3, 2025, deadline for the City to respond to Plaintiff's Rule 60(b) motion is approaching and Mr. Pawar's response to the Court's May 19, 2025 order contains information necessary to that response.